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September 28, 2022

**VIA ECF**

Hon. Ronnie Abrams, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Blitz v. BLDG Mgmt Co. Inc.*, 20-cv-5462 (RA) (RWL)

Dear Judge Abrams:

Our firm represents Defendants BLDG Management Company, Paul Howard and Amy Wolf ("Defendants") in the above-referenced matter.

We write to request that the deadline to file Defendants' summary judgment motion be extended from September 30, 2022 through and including October 31 2022, to allow Defendants sufficient time to complete work on the motion due to unforeseen delays. In particular, the complications of the undersigned's medical condition have required unexpected frequent time-consuming treatments and appointments, the undersigned's childcare unexpectedly fell through, and the religious holidays now combine to make it virtually impossible to file the motion on September 30, 2022.

Plaintiff Richard Blitz provided his consent to this request. On September 23, 2022, via email, Defendants requested the consent of Third-Party Defendant Wendi Newman to this request, but we have not heard a response. Defendants followed up on Tuesday, September 27, 2022. So as not to delay this request, Defendants are filing this request now.

Respectfully,

*/s/ Daniella E. Adler*

Daniella E. Adler

cc: All Counsel (Via ECF)  
Richard Blitz (via Federal Express)

Application granted.

SO ORDERED.

Hon. Ronnie Abrams  
9/29/22